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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

E.B. vs. Uber Technologies, Inc., et al.,
3:25-cv-04526-CRB
[closed 10/16/2025]

**DECLARATION OF D. DOUGLAS
GRUBBS IN SUPPORT OF PLAINTIFF'S
RESPONSE TO THE COURT'S SHOW
CAUSE ORDER REGARDING
DUPLICATIVE CASES (ECF 4501)**

I, Donald Douglas Grubbs, declare:

1. I am an attorney with the law firm of Pulaski Kherkher, PLLC. I am a member of the State Bar of Texas and I am admitted to practice *pro hac vice* before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I received an email from opposing counsel on August 21, 2025 regarding the above-referenced duplicative case.

3. Prior to August 21, 2025, I was unaware that Plaintiff E.B. had also retained the law firm of Anapol Weiss to pursue the same sexual assault action against Defendants or that Anapol Weiss had already filed suit.

4. Upon receiving the email from opposing counsel on August 21, 2025, I emailed the attorneys for Anapol Weiss who were also notified of the duplicative case seeking their availability for a phone call to discuss amicably resolving matter.

5. I also informed opposing counsel on August 21, 2025 that the plaintiff's firms would confer as soon as possible and inform her who was taking the lead. Opposing counsel replied thanking me.

6. On August 22, 2025, I spoke with an Anapol Weiss attorney and offered to take the lead, *i.e.*, continue to pursue the action Pulaski filed on behalf of E.B. The Anapol attorney requested to discuss the matter further with his firm and asked that we circle back the following week.

7. Between August 22 and October 15, 2025, I did not receive any follow-up correspondence from opposing counsel or the Anapol firm regarding the matter.

8. Upon Defendants filing the present motion to dismiss (ECF 4145), I followed up with the Anapol firm on October 15, 2025 and an agreement was made that Anapol's action would proceed and that Pulaski would file a voluntary dismissal.

9. Pulaski filed its voluntary dismissal on October 15, 2025.

10. Pulaski's delay in voluntarily dismissing this matter was not intentional or the result of any dispute with the Anapol firm.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on December 19, 2025 in Houston, Texas.

/s/ D. Douglas Grubbs
D. Douglas Grubbs

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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on December 19, 2025, I electronically transmitted the foregoing
5 DECLARATION IN SUPPORT OF PLAINTIFF'S RESPONSE TO THE COURT'S SHOW
6 CAUSE ORDER REGARDING DUPLICATIVE CASES to the Clerk's office using the CM/ECF
7 system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.
8 Additionally, the foregoing was served on Defendants' counsel via email at:
9 ubermdlservice@listserv.shb.com.

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11 */s/ D. Douglas Grubbs*
12 D. Douglas Grubbs
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